



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 15, 2021

BY ECF

Hon. Sidney H. Stein
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Inigo August Philbrick*, 20 Cr. 351

Dear Judge Stein:

The Government respectfully requests to adjourn its deadline to complete discovery, currently set for June 18, 2021, and the pretrial conference scheduled for June 22, 2021, for an additional 60 days. The Government requests these adjournments because the parties are in discussions regarding a potential resolution of the case, and the parties require additional time to pursue these discussions. The Government will produce discovery to the defendant on a rolling basis but seeks an additional 60 days to complete discovery given that discovery is voluminous. In addition, the Government requests that the Court exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7) until the date of the next pretrial conference so that the parties may pursue their discussions regarding a pretrial disposition and the defendant may review the discovery and consider any potential pretrial motions. The defendant consents to the requested adjournments and the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: _____

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cc: Jeffrey Lichtman, Esq., and Jeffrey Einhorn, Esq., via ECF